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AUG 7 - 1992

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington DC 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

ORIGINAL  
FILE

In re Amendment of )  
FM TABLE OF ALLOTMENTS ) RM-  
 )  
East Camden and Stamps AR, )  
Minden LA )

TO: MASS MEDIA BUREAU (Policy & Rules)

PETITION FOR RULEMAKING

Y95 Radio (Y95), by its attorney, requests amendment of the FM Table of Allotments to delete Channel 237A at Camden AR and to allot Channel 237C1 to East Camden AR. The Commission should modify Y95's license for Station KCXY to reflect these changes. To accommodate the new allotment, Channel 282A should be substituted for Channel 238A (unoccupied) at Stamps AR, and the license for Station KASO-FM, Minden LA should be modified to specify Channel 239A in place of the present Channel 237A, changing the Minden allotment accordingly. (One application is pending for Stamps AR (BPH-920401MB)).

The attached engineering statement of Jefferson G. Brock shows that, at the present KCXY site, KCXY can operate as a Class C1 station, meeting all required separations, if the Commission makes the two changes at Minden and Stamps.

As Mr. Brock notes, the proposed C1 operation of KCXY would appear to be limited by Station KMTB, Murfreesboro AR. However, KMTB has a long-pending petition to change channels (MM Docket 89-290). The change at Murfreesboro should be granted soon, and should not bar the relief requested here.

From the KCXY site, the station with C1 facilities will cover all of East Camden with the required signal. East Camden is an incorporated community. KCXY will be its first station.

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On the other hand, Camden has two remaining FM channels and two AM stations.

If the FM Table is modified as requested, Y95 will reimburse the licensee of Station KASO-FM for reasonable costs incurred in changing frequency.

If Channel 237C1 is allotted to East Camden, Y95 will promptly file application for modification, specifying East Camden as principal community, and proposing Class C1 facilities. Upon grant of permit, Y95 will promptly construct the modified facilities and begin broadcasting.

August 7, 1992

Mark E. Fields, Esq.  
1825 I St. NW  
#400  
Washington DC 20006  
(202) 429-2091

Respectfully submitted,

Y95 RADIO

BY   
Mark E. Fields  
Its Attorney

CERTIFICATE OF SERVICE

I certify that on this 7 day of August 1992  
a true and correct copy of the foregoing document was sent,  
first class mail, postage prepaid, to:

Cook Enterprises, Inc.  
KASO-FM  
Box 1240  
Minden LA 71055

Mediatronics Broadcasting, Inc.  
Station KMTB  
Box 907  
Murfreesboro AR 71958

Wm. Pennington, Esq.  
P.O. Box 4203  
Wilmington NC 28406  
(Counsel for BPH-920401MB)

*Mark E. Fields*

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

PETITION FOR RULE MAKING  
Y95 RADIO  
SUBSTITUTE CHANNEL 237C1 FOR 237A  
ORDER KCXY TO CHANGE CHANNELS  
RE-ALLOT CHANNEL 237C1 TO  
EAST CAMDEN, ARKANSAS  
August 1992

Technical Exhibit  
TE-1

Bromo Communications, Inc.  
P.O. Box M - 1331 Ocean Boulevard, Suite 201  
St. Simons Island, Georgia 31522  
(912) 638-5608

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PETITION FOR RULE MAKING  
Y95 RADIO  
SUBSTITUTE CHANNEL 237C1 FOR 237A  
ORDER KCXY TO CHANGE CHANNELS  
RE-ALLOT CHANNEL 237C1 TO  
EAST CAMDEN, ARKANSAS  
August 1992

TECHNICAL STATEMENT

1. This Technical Statement and attached exhibits were prepared on behalf of Y95 Radio ("Y95"), licensee of Radio Station KCXY, Channel 237A, Camden, Arkansas, and supports its Petition for Rule Making to upgrade the facilities of KCXY. Y95 requests the following changes to the Commission's Table of FM Allotments, §73.202(b); the substitution of Channel 237C1 for Channel 237A at Camden, Arkansas, and the re-allotment of the upgraded channel to East Camden, Arkansas. Y95 further requests that KCXY be ordered to change Class and community of license.

2. In order to accommodate its request, it is necessary to substitute Channel 239A for Channel 237A at Minden, Louisiana, and it is further requested that KASO-FM be ordered to Channel 239A. Further, Y95 asks that Channel 282A be substituted for Channel 238A at Stamps, Arkansas. There is one applicant on file for Stamps, Arkansas, Lafayette County Broadcasting, Inc., File #BPH-920401MB. Y95 requests the applicant be ordered to amend their application at Stamps to specify operation on Channel 282A.

## BACKGROUND

3. Aside from the Minden, Louisiana, and Stamps, Arkansas, allotments previously noted above, an upgrade for KCXY may appear to impact the licensed facility of KMTB, Channel 237A, Murfreesboro, Arkansas. The licensee of KMTB, Mediatronics Broadcasting, Inc. ("MBI"), has requested an upgrade for KMTB. Specifically, in MM Docket #89-290, MBI filed a timely counterproposal seeking to upgrade KMTB to Channel 271C3. This request was in conflict with the request for Channel 271A at Magnolia, Arkansas, and another counterproposal to substitute Channel 271C2 for Channel 269A at Mena, Arkansas.

4. In order to remove the conflicts between these proposals, Channel 258C3 was offered as an alternate channel for Murfreesboro. However, the availability of this alternate channel was in question due to conflicts with a counterproposal in MM Docket #87-73, which was associated with Docket #84-231<sup>1</sup>. Therefore, until Docket #84-231 concluded, thus allowing Docket #87-73 to receive final action, the Murfreesboro alternate channel proposal is presently before the Commission's Allocation Branch. A release of the Report and Order in MM Docket #89-290 is imminent.

<sup>1</sup> Docket #84-231 was remanded to the Commission for further consideration following the outcome of Reeder VS The FCC.

5. On January 14, 1992, the Commission issued a Third Report and Order in MM Docket #84-231, and a subsequent ruling in Docket #87-73. Since both proceedings involved numerous communities, the final allotments made in each will not be listed here, however, due to their conclusion, the Murfreesboro proposal is now ripe for consideration. Since MBI has proposed an upgrade for KMTB on a channel far removed

#### PROPOSAL

6. Y95 requests that Channel 237C1 be substituted for Channel 237A at Camden, Arkansas, and further the re-allotment of the upgraded channel from Camden to East Camden, Arkansas. Presently, Camden has two operating and one vacant, yet applied for, FM allotment (including Channel 237A) and 2 Am stations licensed to the community. East Camden, an incorporated community of 632 persons, has no local broadcast station. The allotment of Channel 237C1 to East Camden would provide the community with its first broadcast outlet, while not depriving Camden of its only local service. Further, an improved KCXY will continue to provide city grade service to Camden.

7. East Camden has a Mayor and town council and numerous businesses. It has all of the community attributes necessary for an allotment. This proposal is mutually exclusive with the present Channel 237A allotment at Camden, Arkansas.

8. Therefore, Y95 requests that Channel 237C1 be allotted to East Camden, Arkansas at reference coordinates; North Latitude 33° 30' 14" and West Longitude 92° 48' 38", (the present KCXY transmitter site). This represents a minor site restriction west of the community to allow the use of the petitioners existing tower structure. Operating from the proposed reference site, a 3.16 mV/m contour will be delivered over East Camden, Arkansas.

9. Exhibit #1 is a visual demonstration of the usable area for Channel 237C1. Also attached, as Exhibit #2, is a detailed clearance analysis of Channel 237C1 from the herein proposed reference location. The usable area and clearance study assume that Channel 239A is substituted for Channel 237A at Minden, Louisiana, and that Channel 282A is substituted for Channel 238A at Stamps, Arkansas, as requested below.

10. Channel 239A can be substituted for Channel 237A at Minden, Louisiana, at the existing KASO-FM transmitter site, at reference coordinates North Latitude 32° 37' 50" and West Longitude 93° 16' 56". From this location, based on KASO-FM's present facility, there will be no change in city grade coverage to Minden. Further, Channel 239A is a six kilowatt Class A allotment, the present Channel 237A is a limited three kilowatt Class A. Exhibit #3 is a usable area map for Channel 239A, with a detailed clearance study attached as Exhibit #4.



11. Y 95 also requests the substitution of Channel 282A for the vacant and yet unapplied for Channel 238A at Stamps, Arkansas. Channel 282A can be allotted to Stamps with a site restriction of 12.2 kilometers north-northwest of the community at reference coordinates North Latitude  $33^{\circ} 30' 14''$  and West Longitude  $92^{\circ} 48' 38''$ . This site restriction is needed to avoid shortspacing the vacant but applied for Channel 283A at Camden, Arkansas, and the licensed facilities of KJLO-FM, Channel 281C, Monroe, Louisiana.

12. Exhibit #5 is the usable area for Channel 282A at Stamps, Arkansas, and demonstrates that the channel can provide the requisite city grade coverage over the community. Exhibit #6 is a clearance analysis for Channel 228A. It should be noted that Channel 238A which was recently allotted to Stamps (Docket #84-231) and was a limited Class A allotment, being made at the community reference point. At that reference location, under present §73.207 spacing requirements, there is a shortspace to the licensed KCXY facility. Therefore, in order for Channel 238A to be a six kilowatt Class A channel at Stamps, it would have to be site restricted from the community, in a similar direction as is required for Channel 282A.

## PUBLIC INTEREST ASPECTS

13. An improved KCOY operating as a maximum Class C1 facility would provide service to 186,603 persons, in 18,374 square kilometers, an increase of 137,855 persons and 14,791 square kilometers over its present Class A channel. Further, the allotment of Channel 237C1 to East Camden, Arkansas, will provide first local service to a community, while not depriving Camden of its only local service.

14. Additionally, the requested substitution of channel at Minden, Louisiana, would allow KASO-FM to upgrade its facility to a six kilowatt Class A facility, potentially increasing the population served by KASO-FM to 19,545 persons<sup>2</sup> over its present licensed facility. Due to the nature of the channel change<sup>3</sup>, only minimal disruption to the existing facility would be anticipated.

<sup>2</sup> Assumes KASO-FM as a maximum Class A facility at its present site vs its licensed operation.

<sup>3</sup> A second adjacent channel to the existing allotment is proposed at Minden, Louisiana. This potentially would allow use of the station's present transmission systems with only a minor re-tuning of the existing transmitter and antenna.

15. The proposed Stamps, Arkansas, alternate channel is slightly more site restricted than the existing allotment, however, since there is not actual facility being required to make a frequency change and any applicants for the channel would have just been filed, there will be no disruption or actual delay to the potential service at Stamps.

REQUEST

16. Y95 Radio therefore requests the following changes to §73.202(b) of the Commission's rules:

EAST CAMDEN, ARKANSAS

Present  
None

Proposed  
237C1

CAMDEN, ARKANSAS

Present  
237A, 246C2, 283A

Proposed  
246C2, 283A

MINDEN, LOUISIANA

Present  
237A

Proposed  
239A

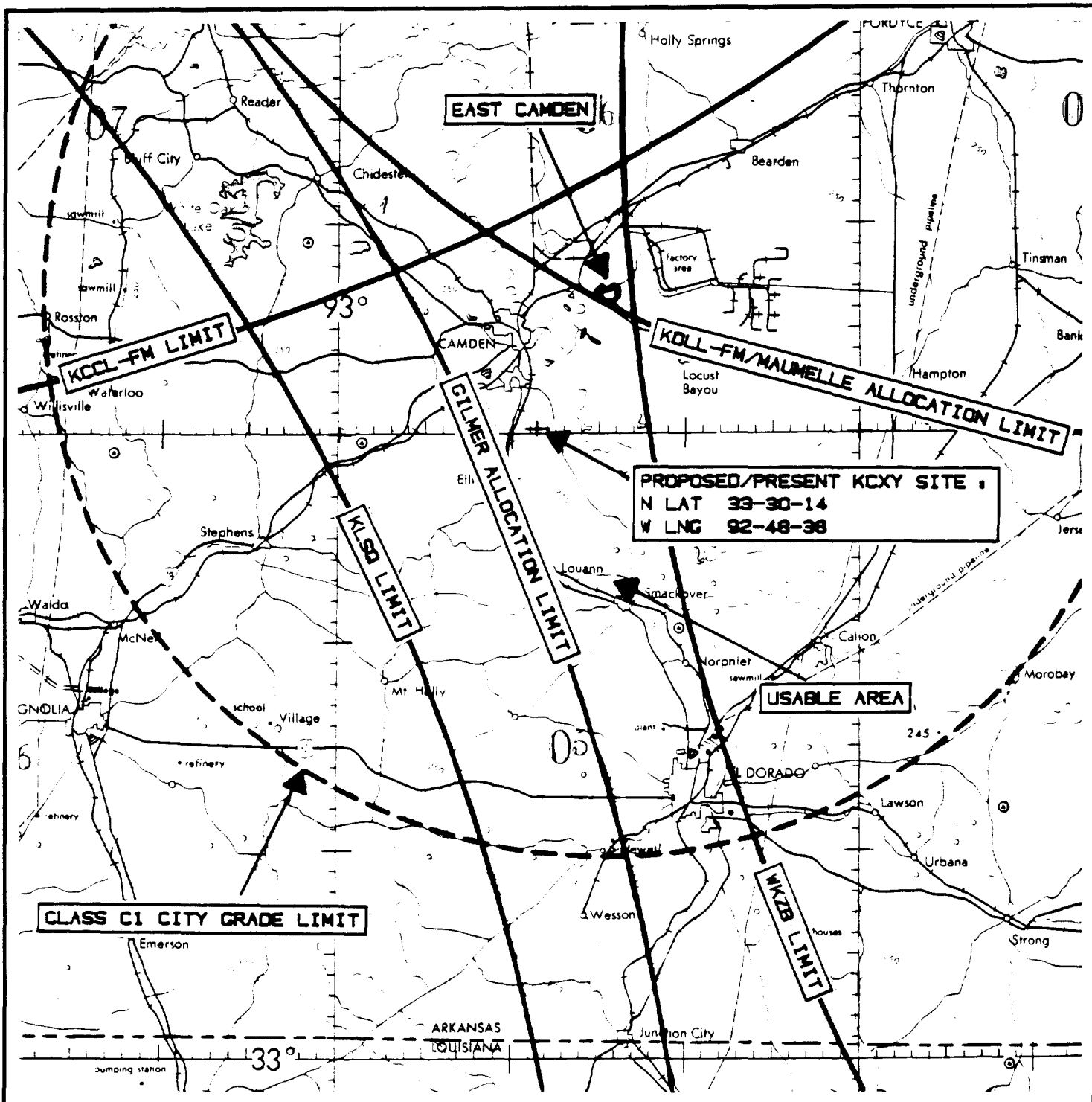
STAMPS, ARKANSAS

Present  
238A, 263C2

Proposed  
263C2, 282A

17. When Channel 237C1 is allotted to East Camden, Arkansas, Y95 will file, on a timely basis, an application seeking authority to make minor changes in the facilities of KCXY to specify operation on Channel 237C1 to East Camden, Arkansas. Further, Y95 will reimburse the licensee of KASO-FM for reasonable expenses to effectuate the herein proposed channel change at Minden, Louisiana.

18. The foregoing technical statement was prepared for Y95 Radio by Bromo Communications, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. Should any questions arise during consideration of this proposal, we would welcome the opportunity to discuss the matter by phone at (912) 638-5608.



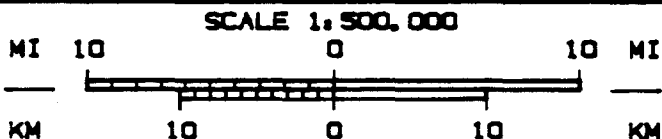
USABLE AREA CHANNEL 237C1

MAP IS A PORTION OF THE 1:500,000 SCALE  
MEMPHIS SECTIONAL AERONAUTICAL CHART.

EXHIBIT #1

PETITION FOR RULE MAKING  
Y95 RADIO  
SUB. CH 237C1 FOR CH 237A  
RE-ALLOT CHANNEL 237C1 TO  
EAST CAMDEN, ARKANSAS

August 1992



**BROMO**  
COMMUNICATIONS

BROADCAST  
TECHNICAL CONSULTANTS

St Simons Island, Georgia

Washington, D C

ALLOCATION STUDY FOR EAST CAMDEN, ARKANSAS  
USING PRESENT KCXY SITE/PROPOSED ALLOCATION SITE AS REF.

REFERENCE	CLASS C1	DISPLAY DATES
33 30 14 N		DATA 06-24-92
92 48 38 W	Current rules spacings	SEARCH 08-05-92
----- CHANNEL 237 - 95.3 MHz -----		

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
KCXY	237A	Camden	AR	0.0	0.00	200.0	-200.00 *
ALOPEN	237C3	Gilmer	TX	245.7	216.18	211.0	5.18
KLSQ.A	237C3	Gilmer	TX	244.1	218.30	211.0	7.30
WKZB	237A	Drew	MS	81.3	209.85	200.0	9.85
KOLLFM	235C	Pine Bluff	AR	27.8	117.60	105.0	12.60
KOLLFM	235C	Maumelle	AR	27.8	117.60	105.0	12.60
KCCLFM	237A	Paris	AR	336.3	217.73	200.0	17.73
KLSQ	237A	Gilmer	TX	244.1	218.30	200.0	18.30
KASOFM	239A	Minden	LA	204.5	106.40	75.0	31.40
AD239	239A	Ruston	LA	171.6	109.75	75.0	34.75
KSSN	239C	Little Rock	AR	11.6	146.66	105.0	41.66
WQNZ.C	236C	Natchez	MS	149.2	257.62	209.0	48.62
ALOPEN	240C3	Hooks	TX	274.0	125.87	76.0	49.87

**CLEARANCE STUDY CHANNEL 237C1**

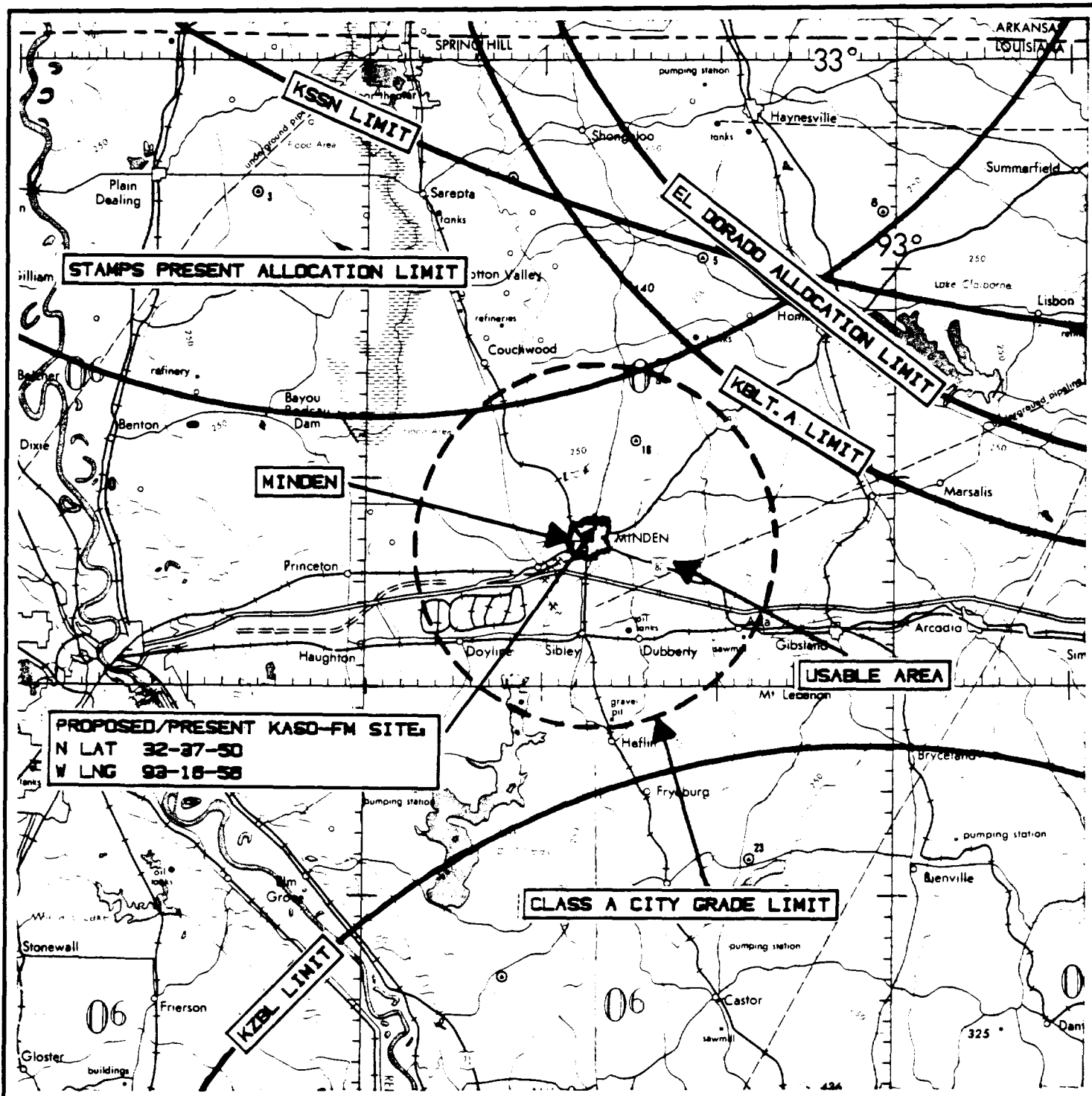
ASSUMES KASO-FM MINDEN, LOUISIANA ON  
CHANNEL 239A AND CHANNEL 282A ALLOCATED  
TO STAMPS, ARKANSAS, IN LIEU OF CH 238A.

**EXHIBIT #2**

**PETITION FOR RULE MAKING  
Y95 RADIO  
SUB. CH 237C1 FOR CH 237A  
RE-ALLOT CHANNEL 237C1 TO  
EAST CAMDEN, ARKANSAS**

August 1992

<p><b>BROMO</b> <b>COMMUNICATIONS</b></p> <p>St Simons Island, Georgia</p>	<p>BROADCAST TECHNICAL CONSULTANTS</p> <p>Washington, D.C.</p>
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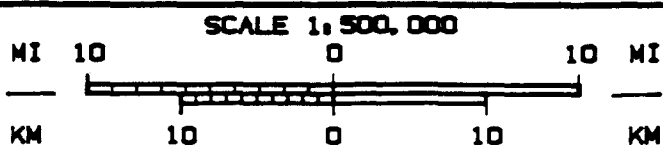
#### USABLE AREA CHANNEL 239A

MAP IS A PORTION OF THE 1:500,000 SCALE  
MEMPHIS SECTIONAL AERONAUTICAL CHART.

#### EXHIBIT #3

PETITION FOR RULE MAKING  
Y95 RADIO  
SUB. CH 237C1 FOR CH 237A  
RE-ALLOT CHANNEL 237C1 TO  
EAST CAMDEN, ARKANSAS

August 1982



**BROMO**  
COMMUNICATIONS

St Simons Island, Georgia

BROADCAST  
TECHNICAL CONSULTANTS

Washington, D C

ALLCOATION STUDY FOR MINDEN, LOUISIANA  
USING PRESENT KASO-FM SITE AS REFERENCE

REFERENCE  
32 37 50 N  
93 16 56 W

CLASS A  
Current rules spacings  
CHANNEL 239 - 95.7 MHz

DISPLAY DATES  
DATA 06-24-92  
SEARCH 08-05-19

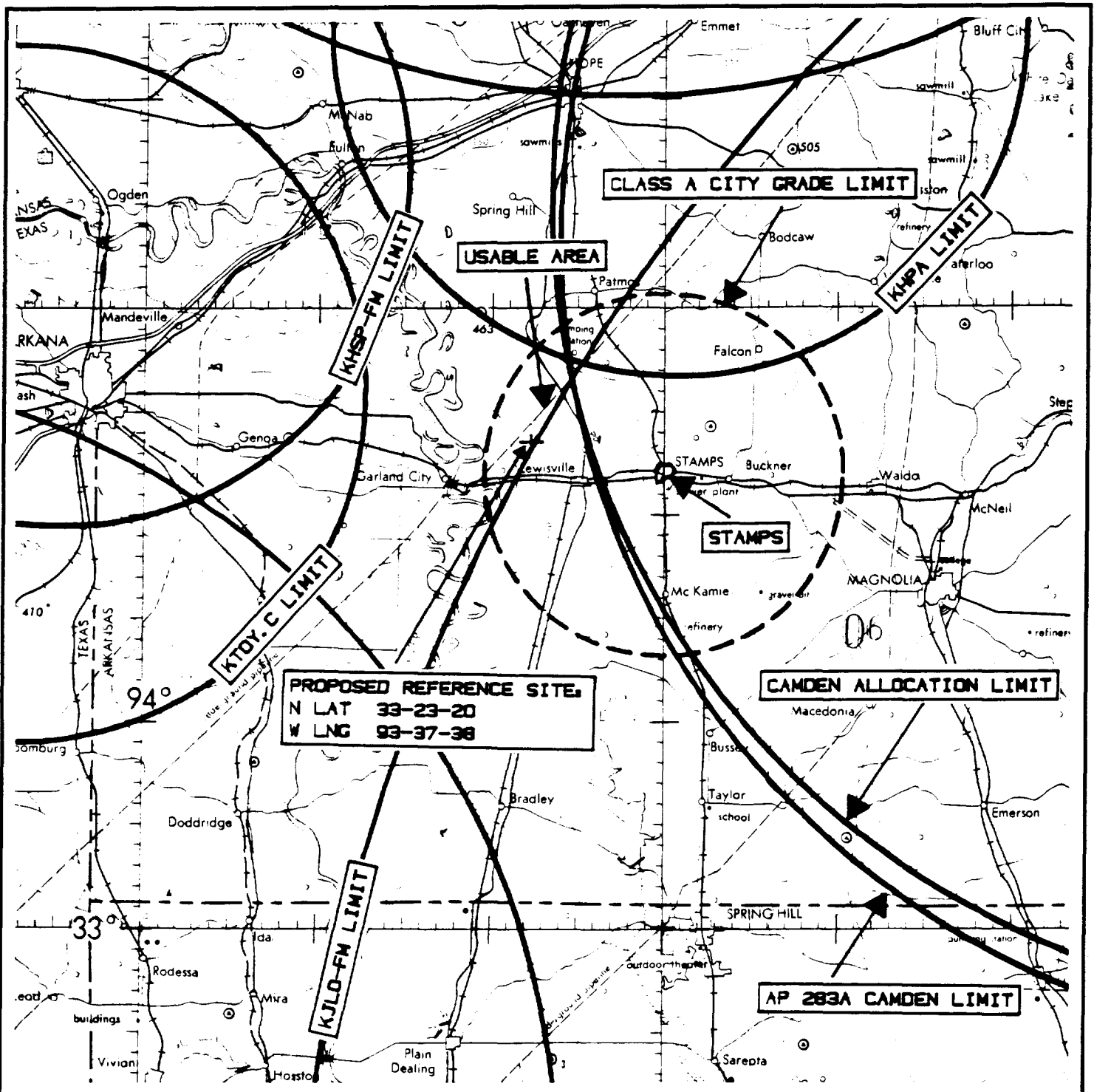
CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
KASOFM	237A	Minden	LA	0.0	0.00	31.0	-31.00 *
ALOPEN	238A	Stamps	AR	345.9	83.60	72.0	11.60
AP238	238A	Stamps	AR	347.3	87.86	72.0	15.86
KBLT.C	241C1	El Dorado	AR	39.4	92.12	75.0	17.12
KBLT	240A	El Dorado	AR	39.4	92.12	72.0	20.12
KZBL	240A	Natchitoches	LA	165.1	94.71	72.0	22.71
KSSN	239C	Little Rock	AR	16.9	251.45	226.0	25.45
AD241	241A	Ruston	LA	101.0	61.58	31.0	30.58
AD241	241A	Ruston	LA	101.0	61.58	31.0	30.58
KLLI.A	240C3	Hooks	TX	317.4	124.42	89.0	35.42
ALOPEN	240C3	Hooks	TX	322.1	133.85	89.0	44.85

CLEARANCE STUDY CHANNEL 239A

EXHIBIT #4  
PETITION FOR RULE MAKING  
Y95 RADIO  
SUB. CH 237C1 FOR CH 237A  
RE-ALLOT CHANNEL 237C1 TO  
EAST CAMDEN, ARKANSAS  
August 1992

**BROMO**  
COMMUNICATIONS  
St Simons Island, Georgia  
BROADCAST  
TECHNICAL CONSULTANTS  
Washington, D.C.

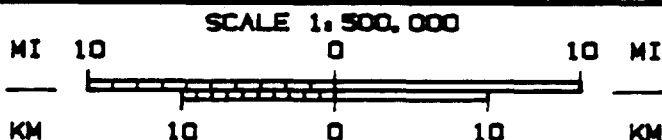




### USABLE AREA CHANNEL 282A

MAP IS A PORTION OF THE 1,500,000 SCALE  
MEMPHIS SECTIONAL AERONAUTICAL CHART.

**EXHIBIT #5**  
**PETITION FOR RULE MAKING**  
**Y95 RADIO**  
**SUB. CH 237C1 FOR CH 237A**  
**RE-ALLOT CHANNEL 237C1 TO**  
**EAST CAMDEN, ARKANSAS**  
**August 1982**



**BROMO**  
**COMMUNICATIONS**  
BROADCAST  
TECHNICAL CONSULTANTS  
St Simons Island, Georgia  
Washington, D.C.

ALLOCATION STUDY FOR STAMPS, ARKANSAS  
USING PROPOSED ALLOCATION SITE AS REFERENCE

REFERENCE	CLASS A	DISPLAY DATES
33 23 20 N		DATA 06-24-92
93 37 38 W	Current rules spacings	SEARCH 08-05-19
----- CHANNEL 282 -104.3 MHz -----		

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
KJLOFM	281C	Monroe	LA	119.3	165.01	165.0	0.01 <
AP283	283A	Camden	AR	76.1	76.75	72.0	4.75
ALOPEN	283A	Camden	AR	73.6	76.92	72.0	4.92
KHPA	285A	Hope	AR	19.8	38.96	31.0	7.96
KTOY.C	284A	Texarkana	AR	275.6	46.03	31.0	15.03
KHSPFM	280A	Ashdown	AR	299.4	48.02	31.0	17.02
KTOY.A	284A	Texarkana	AR	278.3	52.24	31.0	21.21
KJTX	283A	Jefferson	TX	227.0	95.25	72.0	23.25
KWXE.C	283A	Glenwood	AR	4.8	102.59	72.0	30.59
KGASFM	282A	Carthage	TX	207.1	156.01	115.0	41.01
KGASFM	282A	Carthage	TX	208.5	157.25	115.0	42.25

CLEARANCE STUDY CHANNEL 282A

**EXHIBIT #6**  
**PETITION FOR RULE MAKING**  
**Y95 RADIO**  
**SUB. CH 237C1 FOR CH 237A**  
**RE-ALLOT CHANNEL 237C1 TO**  
**EAST CAMDEN, ARKANSAS**  
 August 1992

<b>BROMO</b> <b>COMMUNICATIONS</b>	<small>BROADCAST TECHNICAL CONSULTANTS</small>
<small>St Simons Island, Georgia</small>	<small>Washington, D.C.</small>

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

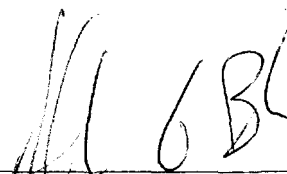
State of Georgia     )  
St. Simons Island    )           ss:  
County of Glynn      )

JEFFERSON G. BROCK being duly sworn, deposes and says that he is an officer of Bromo Communications, Inc. Bromo has been engaged by Y95 Radio, licensee of KCXY, to prepare the attached Technical Exhibit.


His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 5th day of August, 1992.

  
\_\_\_\_\_  
Jefferson G. Brock  
Affiant

Sworn to and subscribed before  
me this the 5th day of August, 1992.

  
\_\_\_\_\_  
Notary Public, State of Georgia  
My Commission Expires: September 8, 1995